

October 6, 2014

Christopher Calfee, Senior Counsel
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c/o CEQA.Guidelines@ceres.ca.gov

Re: OPR's Preliminary Proposed New Section 15064.3 (CEQA transportation analysis)

I appreciate the OPR's work to institute another way to analyze transportation impacts, apart from level of service. I am gratified to read the proposed language under the Purpose: "A project's effect on automobile delay does not constitute a significant environmental impact." I support the progressive direction this new Section 15046.3 takes us in planning.

The following are my suggestions for further improving the proposed draft for CEQA Guidelines.

Text proposed in amendment:

(a) Purpose.

...Indirect effects of project-related transportation, such as impacts to air quality and noise, may also be relevant, but may be analyzed together with stationary sources in other portions of the environmental document.

Comment 1. I recommend revising to say: "...such as impacts to air quality, noise, and land use, may also be relevant..."

Text proposed in amendment:

(b) Criteria for Analyzing Transportation Impacts.

For the purposes of this section, "vehicle miles traveled" refers to distance of automobile travel associated with a project.

Comment 2. If vehicle miles traveled means miles traveled only by automobile, why not call it "automobile miles traveled" instead? This would be clearer and less likely to confuse readers that it might apply to bicycle miles, or even freight truck miles.

Text proposed in amendment:

(b)(1) ...Development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor generally may be considered to have a less than significant transportation impact.

Comment 3. This section should include or reference how the terms "major transit stop" and "high quality transit corridor" are defined for CEQA environmental analysis.

Comment 4. Suggested edit: "e.g." (*for example*) should replace "i.e." (*that is to say*) in the following:

“(3) Local Safety. (A) Increase exposure of bicyclists and pedestrians in vehicle conflict areas (i.e., remove pedestrian and bicycle facilities, increase roadway crossing times or distances, etc.).”

Appendix G, XVI. TRANSPORTATION (b)

“...(i.e., by adding new mixed-flow lanes)...”

Text proposed in amendment:

Appendix F. Energy Conservation

In order to assure that energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3)).

Comment 5. With the intent communicated by “with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy,” this amendment is a timely opportunity to include such intent for consumption of water, too. The CEQA Checklist, under VIII. Hydrology, asks about impacts to groundwater supplies and recharge (question (b)), yet does not ask about inefficient, wasteful, or unnecessary consumption of water.

It would be beneficial to add water implications to the impact possibilities and potential conservation measures listed under “II. EIR Contents” of Appendix F. Including water consumption/conservation under A, B, and/or C would be consistent with the recommended Mitigation Measure under D: “2. The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid-waste.”

Text proposed in amendment:

III. EIR Contents, (A) Project Description

5. Total estimated daily vehicle trips to be generated by the project and the additional energy consumed per trip by mode.

Comment 6.

Since other impacts and mitigation measures use vehicle miles traveled, it may be worthwhile to change or explicitly tie the estimated daily vehicle trips to VMT.

Text proposed in amendment:

III. EIR Contents, D. Mitigation Measures may include:

6. Potential measures to reduce vehicle miles traveled include, but are not limited to:
- a. Improving or increasing access to transit.
 - f. Orienting the project toward transit, bicycle and pedestrian facilities.
 - g. Improving pedestrian or bicycle networks, or transit service.

Comment 7. Revise a, f, and g to take out redundant recommendations. For example,

- a. Improving or increasing access to transit service.
- f. Orienting the project toward transit, bicycle and pedestrian facilities.
- g. Improving pedestrian or bicycle networks.

“Orienting toward” may prove to be too vague. Some people may assume OPR means “orienting” in terms of transit-oriented development (TOD); people not familiar with, or not in favor of, TOD, may interpret this another way that could be more narrow or more broad than what OPR intended.

Text proposed in amendment:

III. EIR Contents, D. Mitigation Measures may include:

- i. Providing bicycle parking.
- j. Limiting parking supply.

Comment 8. Revise j to read “Limiting supply of car parking; minimizing free car parking.”

Text proposed in amendment:

III. EIR Contents, G. Irreversible Commitment of Resources may include a discussion of how the project preempts future energy development or future energy conservation.

Comment 7. Add water supply/consumption and water conservation.

Text proposed in amendment:

Appendix G

XVI. TRANSPORTATION

- a) Conflict with a plan, ordinance or policy addressing the safety or performance of the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?

Comment 8a. Bike lanes should be revised to bikeways. As is, the language seems to purposefully exclude bike paths and bike routes (classes I and II) as examples.

Comment 8b. Suggested edits:

- b) Cause the number of vehicle miles traveled (per capita, per service population, or other appropriate measure) to exceed the regional average for that land use?

- d) Substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (e.g., by adding new mixed-flow lanes) , by adding new roadways to the network, or by substantially increasing free car parking?

Thank you very much for your time and efforts.

Sincerely,

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